

Comments on Interagency Questions & Answers Regarding Flood Insurance (2009)

It has been brought to the attention of the National Flood Determination Association (NFDA) that several stakeholders, including the Mortgage Bankers Association (MBA) and Housing Policy Council (HPC), are submitting comments to the six Federal Financial Regulatory Agencies regarding the recently released and proposed *Interagency Questions and Answers Regarding Flood Insurance (2009)*. NFDA has had the opportunity to review some of these comments and supports the recommendations being made related to allowing lending institutions additional time to make system and procedural changes necessary to comply with the new guidelines.

The NFDA is a professional organization of companies that supply FEMA flood hazard data to federally regulated lenders to facilitate compliance with the mandatory purchase requirements under the National Flood Insurance Program (NFIP). As such, NFDA companies play a key role in resolving flood zone discrepancies that may arise from time to time, and we understand the significant implications that the new guidance has on the systems and business practices of financial institutions. Due to the immense undertaking that training, procedural changes and system enhancements represent and the challenges that flood determination companies have been witnessing first-hand as we strive to meet our customers' evolving needs, NFDA strongly supports the recommendation to extend the date for compliance with the revised guidelines to April 1, 2010.

The NFDA continues to track changes to guidance and regulatory requirements that affect the customers of flood determination companies, and to ensure that we understand and support their compliance needs. NFDA also continues to host an inter-industry dialogue regarding the resolution of flood zone discrepancies in order to establish recommended practices amongst all stakeholder groups affected in the process and to better prepare our lender customers for complying with the new guidance. The NFDA sincerely appreciates the Regulatory Agencies' recognition of the current challenges facing lenders and your serious consideration of a reasonable and feasible extension to the implementation window.

Thank you for your attention to this matter and for the opportunity to provide feedback on guidance that affects numerous stakeholders of the NFIP. If you have any questions about the NFDA or our position on this issue, please feel free to contact me at 800.833.6347 ext. 642 or leila.taha@lpsvcs.com.

Sincerely,



Leila Taha
President, National Flood Determination Association

cc: Vicki Vidal, Associate Vice President – Loan Administration, Mortgage Bankers Association
Paul Leonard, Vice President of Government Affairs, Housing Policy Council